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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VRECEIVED
APR 27 1988
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DATE:

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SUBJECT:

ACTION MEMORANDUM - Request for Removal Action at the Revere
Copper and Brass site, Detroit, Michigan. (Site Spill ID #AL)

FROM:

Peter D. Neithercut, On-Scene Coordinator
Emergency Response Branch*RJ Bondi for PDM*

TO:

Basil G. Constantelos, Director
Waste Management DivisionMary A. Gade, Associate Division Director
Office of SuperfundPURPOSE:

The purpose of this memorandum is to confirm a verbal request for \$90,000 to initiate an immediate removal at the Revere Copper and Brass (RCB) site located in Detroit, MI. Verbal approval was obtained on March 17, 1988.

BACKGROUND:

The Revere Copper and Brass site is located at 5851 W. Jefferson Avenue, in Wayne County, Detroit, Michigan. The approximately 30-acre site is bordered on the Detroit River, an international waterway. The western edge of the site is unrestricted along the West Jefferson Avenue side. The site access is restricted along the north and south by security fencing owned and maintained by adjacent property owners.

During its 65 years of ownership, RCB operated a metal fabrication facility on this property. Scrap and virgin copper was melted into "cakes", which were then converted to finished products. The facility was closed and all manufacturing equipment was removed in 1985. The site was then relinquished to the City of Detroit's Community Economic Development Department.

The site is used by local fisherman to access the Detroit River. The property is also used as an unrestricted dump site for demolition debris, industrial refuse, tires, and household garbage. The abandoned buildings have been heavily vandalized. Scavengers are stripping the site of building materials and scrap metals. Structural steel columns have been removed resulting in the collapse of large sections of the buildings. Metal pipes were cut away and stripped of asbestos wrapping, resulting in piles of friable asbestos on the floors of the buildings.

EPA Region 5 Records Ctr.



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On September 17, 1987 members of the United States Environmental Protection Agency (U.S.EPA) Technical Assistance Team (TAT) conducted a site assessment at the RCB facility. The TAT members discovered approximately forty eight (48) electrical capacitors mounted in racks in two equipment pits. Labels on the capacitors indicated they contained two gallons of a dielectrical fluid contaminated with polychlorinated biphenyls (PCB).

On March 15, 1988 a private citizen reported, to the U.S.EPA, that several new drums had just been dumped along the Detroit River on the RCB site. The U.S.EPA responded and observed eleven drums, spilled transformer oil, and two empty transformer carcasses approximately 20 feet from the Detroit River.

This site is not on the National Priorities List.

THREAT:

This facility presented an immediate and substantial threat to human health and the environment. Paragraph 300.65(b)(2) of the National Contingency Plan (NCP) authorizes an immediate removal if any of the following criteria are met.

1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;

Access to the RCB site is not restricted. A common practice of salvagers is to open capacitors to recover the contained copper resulting in direct exposure to PCB's. The abandoned drums and spilled transformer oil was in an area used for parking by sports fishermen. Children have been observed playing in this area while their parents fished. Fishermen and others frequently cross the sites and roadways have been established on the site for vehicles. There is evidence that illegal activities such as automobile stripping occurs very frequently in the buildings on the site.

2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or bulk storage containers, that may pose a threat of release; and,

The 11 drums in the transformer spill area were all on their side as if they had been pushed off the back of a truck. An inspection of these drums showed they all contained varying amounts of an unknown material. It also showed that the drums were dented, bent, and several of the bungs were open. The content of the drums were found to contain a high level of PCB, a hazardous substance.

3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Analytical results from the samples taken in the spill area showed the PCB levels above 750,000 ppm. Due to the spill area's proximity to the Detroit River, the potential existed for PCB contamination to migrate off-site into the river, exposing aquatic life and food chains.

ENFORCEMENT:

See the confidential enforcement section in Attachment I.

PROPOSED PROJECT AND COST:

The objective of this removal was to mitigate the actual or potential hazards by removing PCB contaminated material from the site. The following actions were taken at this site:

- 1) Development and implementation of a site safety and security plan.
- 2) Staging and sampling of suspected containers and wastes piles.
- 3) Bulking of wastes into compatible waste streams.
- 4) transportation and disposal of these waste streams.

Redacted information not relevant to selection of removal action

This removal action required approximately 10 on-site working days to complete. It will be necessary for the City of Detroit to conduct an in-depth extent of contamination study in order to fully characterize any remaining hazards, prior to conducting a site clean up. The action completed is consistent with any long-term remedial action that may be taken.

RECOMMENDATION:

Because the conditions at the Revere Copper and Brass site in Detroit, Michigan, meet the NCP Section 300.65 criteria for a removal action, your approval of this removal request is recommended. The estimated total project costs are \$90,000, of which up to \$75,200 (\$58,000 line item, plus \$5,000 contingency, plus up to \$10,200 of extramural contingency) could be used for extramural cleanup contractor costs. As the City of Detroit has indicated their intention to perform a full site cleanup, it is expected that no further costs will be incurred. You may indicate your decision by signing in the spaces below.

APPROVE:

M. A. Gale, Acting
Director, Waste Management Division

DATE: 7/27/88

DISAPPROVE:

Director, Waste Management Division

DATE: _____

ATTACHMENT I

Confidential Enforcement Section

Redacted information not relevant to selection of removal action